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6 **UNITED STATES DISTRICT COURT**  
7 **WESTERN DISTRICT OF WASHINGTON**  
8 **AT SEATTLE**

9 FEDERAL TRADE COMMISSION, *et al.*,

10 Plaintiffs,

11 v.

12 AMAZON.COM, INC., a corporation,

13 Defendant.

**CASE NO.: 2:23-cv-01495-JHC**

**STIPULATED MOTION AND  
ORDER TO SEAL  
PORTIONS OF THE SECOND  
AMENDED COMPLAINT**

NOTE ON MOTION CALENDAR:  
October 31, 2024

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16 The parties, by and through their attorneys of record, respectfully request that the Court  
17 enter the proposed order set forth below, sealing portions of Plaintiffs' Second Amended  
18 Complaint.

19 In support of this request, the parties represent the following to the Court:

- 20 1. On September 30, 2024, the Court issued an Order on Defendant's Motion to  
21 Dismiss & Plaintiffs' Motion to Bifurcate (Dkt. #289), which granted Plaintiffs  
22 until October 31, 2024, leave to file a Second Amended Complaint as to any  
23 claims dismissed without prejudice.

2. Pursuant to that Order, Plaintiffs are filing a Second Amended Complaint that amends claims under the state laws of Maryland, Pennsylvania, and New Jersey. The only substantive changes to the Second Amended Complaint relate to these state law claims.
3. The Court previously entered three orders sealing portions of the Complaint. Dkts. #108, 120, 172.
4. The Second Amended Complaint includes information the Court previously ordered to be sealed. Dkts. #108, 120, 172. That information is highlighted in the Second Amended Complaint.
5. Plaintiffs are filing a public version of the Second Amended Complaint redacting only the information the Court previously ordered to be sealed. Dkts. #108, 120, 172.
6. Pursuant to Local Civil Rule 5(g)(3)(A), the undersigned counsel certify that they met and conferred to reach the agreement described in this Stipulated Motion. The following attorneys conferred by email on October 29, 2024 and October 31, 2024: Edward Takashima, Kara King, and Michael Baker for the FTC; Michael Jo for the State of New York; Tim Smith for the State of Oregon; Rahul Darwar and Victoria Field for the State of Connecticut; and Kristen DeWilde, Katherine Trefz, Robert Keeling, Katharine Mitchell-Tombras, Molly Terwilliger, and CJ Pruski for Amazon.
7. The parties stipulate as follows, subject to Court approval, and jointly request that the Court enter the following Order approving this Stipulation:
  - a. The highlighted portions of the Second Amended Complaint shall be sealed.

1 Stipulated to and respectfully submitted this 31st day of October, 2024, by:

2 s/ Kara King

SUSAN A. MUSSER (DC Bar # 1531486)

3 EDWARD H. TAKASHIMA (DC Bar # 1001641)

KARA KING (DC BAR # 90004509)

4 Federal Trade Commission

600 Pennsylvania Avenue, NW

5 Washington, DC 20580

Tel.: (202) 326-2122 (Musser)

(202) 326-2464 (Takashima)

6 Email: smusser@ftc.gov

7 etakashima@ftc.gov

8 kking@ftc.gov

9 *Attorneys for Plaintiff Federal Trade Commission*

s/ Michael Jo

Michael Jo (admitted *pro hac vice*)  
Assistant Attorney General, Antitrust Bureau  
New York State Office of the Attorney  
General  
28 Liberty Street  
New York, NY 10005  
Telephone: (212) 416-6537  
Email: Michael.Jo@ag.ny.gov  
*Counsel for Plaintiff State of New York*

s/ Rahul A. Darwar

Rahul A. Darwar (admitted *pro hac vice*)  
Assistant Attorney General  
Office of the Attorney General of Connecticut  
165 Capitol Avenue  
Hartford, CT 06016  
Telephone: (860) 808-5030  
Email: Rahul.Darwar@ct.gov  
*Counsel for Plaintiff State of Connecticut*

s/ Alexandra C. Sosnowski

Alexandra C. Sosnowski (admitted *pro hac vice*)  
Assistant Attorney General  
Consumer Protection and Antitrust Bureau  
New Hampshire Department of Justice  
Office of the Attorney General  
One Granite Place South  
Concord, NH 03301  
Telephone: (603) 271-2678  
Email: Alexandra.c.sosnowski@doj.nh.gov  
*Counsel for Plaintiff State of New Hampshire*

s/ Robert J. Carlson

Robert J. Carlson (admitted *pro hac vice*)  
Assistant Attorney General  
Consumer Protection Unit  
Office of the Oklahoma Attorney General  
15 West 6th Street, Suite 1000  
Tulsa, OK 74119  
Telephone: (918) 581-2885  
Email: robert.carlson@oag.ok.gov  
*Counsel for Plaintiff State of Oklahoma*

s/ Timothy D. Smith

Timothy D. Smith, WSBA No. 44583  
Senior Assistant Attorney General  
Antitrust and False Claims Unit  
Oregon Department of Justice  
100 SW Market St  
Portland, OR 97201  
Telephone: (503) 934-4400  
Email: tim.smith@doj.state.or.us  
*Counsel for Plaintiff State of Oregon*

s/ Jennifer A. Thomson

Jennifer A. Thomson (admitted *pro hac vice*)  
Senior Deputy Attorney General  
Pennsylvania Office of Attorney General  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120  
Telephone: (717) 787-4530  
Email: jthomson@attorneygeneral.gov  
*Counsel for Plaintiff Commonwealth of Pennsylvania*

s/ Michael A. Undorf

Michael A. Undorf (admitted *pro hac vice*)  
Deputy Attorney General  
Delaware Department of Justice  
820 N. French St., 5th Floor  
Wilmington, DE 19801  
Telephone: (302) 683-8816  
Email: michael.undorf@delaware.gov  
*Counsel for Plaintiff State of Delaware*

s/ Christina M. Moylan

Christina M. Moylan (admitted *pro hac vice*)  
Assistant Attorney General  
Chief, Consumer Protection Division  
Office of the Maine Attorney General  
6 State House Station  
Augusta, ME 04333-0006  
Telephone: (207) 626-8800  
Email: christina.moylan@maine.gov  
*Counsel for Plaintiff State of Maine*

s/ Gary Honick

Gary Honick (admitted *pro hac vice*)  
 Assistant Attorney General  
 Deputy Chief, Antitrust Division  
 Office of the Maryland Attorney General  
 200 St. Paul Place  
 Baltimore, MD 21202  
 Telephone: (410) 576-6470  
 Email: Ghonick@oag.state.md.us  
*Counsel for Plaintiff State of Maryland*

s/ Katherine W. Krems

Katherine W. Krems (admitted *pro hac vice*)  
 Assistant Attorney General, Antitrust Division  
 Office of the Massachusetts Attorney General  
 One Ashburton Place, 18th Floor  
 Boston, MA 02108  
 Telephone: (617) 963-2189  
 Email: katherine.krems@mass.gov  
*Counsel for Plaintiff Commonwealth of Massachusetts*

s/ Scott A. Mertens

Scott A. Mertens (admitted *pro hac vice*)  
 Assistant Attorney General  
 Michigan Department of Attorney General  
 525 West Ottawa Street  
 Lansing, MI 48933  
 Telephone: (517) 335-7622  
 Email: MertensS@michigan.gov  
*Counsel for Plaintiff State of Michigan*

s/ Zach Biesanz

Zach Biesanz (admitted *pro hac vice*)  
 Senior Enforcement Counsel  
 Office of the Minnesota Attorney General  
 445 Minnesota Street, Suite 1400  
 Saint Paul, MN 55101  
 Telephone: (651) 757-1257  
 Email: zach.biesanz@ag.state.mn.us  
*Counsel for Plaintiff State of Minnesota*

s/ Lucas J. Tucker

Lucas J. Tucker (admitted *pro hac vice*)  
 Senior Deputy Attorney General  
 Office of the Nevada Attorney General  
 100 N. Carson St.  
 Carson City, NV 89701  
 Telephone: (775) 684-1100  
 Email: LTucker@ag.nv.gov  
*Counsel for Plaintiff State of Nevada*

s/ Andrew Esoldi

Andrew Esoldi (admitted *pro hac vice*)  
 Deputy Attorney General  
 New Jersey Office of the Attorney General  
 124 Halsey Street, 5th Floor  
 Newark, NJ 07101  
 Telephone: (973) 648-7819  
 Email: andrew.esoldi@law.njoag.gov  
*Counsel for Plaintiff State of New Jersey*

s/ Jeffrey Herrera

Jeffrey Herrera (admitted *pro hac vice*)  
 Assistant Attorney General  
 New Mexico Office of the Attorney General  
 408 Galisteo St.  
 Santa Fe, NM 87501  
 Telephone: (505) 490-4878  
 Email: jherrera@nmag.gov  
*Counsel for Plaintiff State of New Mexico*

s/ Zulma Carrasquillo Almena

Zulma Carrasquillo Almena (admitted *pro hac vice*)  
 Puerto Rico Department of Justice  
 P.O. Box 9020192  
 San Juan, Puerto Rico 00902-0192  
 Telephone: (787) 721-2900, Ext. 1211  
 Email: zcarrasquillo@justicia.pr.gov  
*Counsel for Plaintiff Commonwealth of Puerto Rico*

s/ Stephen N. Provazza

Stephen N. Provazza (admitted *pro hac vice*)  
Special Assistant Attorney General  
Chief, Consumer and Economic Justice Unit  
Department of the Attorney General  
150 South Main Street  
Providence, RI 02903  
Telephone: (401) 274-4400  
Email: sprovazza@riag.ri.gov  
*Counsel for Plaintiff State of Rhode Island*

s/ Sarah L.J. Aceves

Sarah L.J. Aceves (admitted *pro hac vice*)  
Assistant Attorney General  
Public Protection Division  
Vermont Attorney General's Office  
109 State Street  
Montpelier, VT 05609  
Telephone: (802) 828-3170  
Email: Sarah.Aceves@vermont.gov  
*Counsel for Plaintiff State of Vermont*

s/ Laura E. McFarlane

Laura E. McFarlane (admitted *pro hac vice*)  
Assistant Attorney General  
Wisconsin Department of Justice  
Post Office Box 7857  
Madison, WI 53707-7857  
Telephone: (608) 266-8911  
Email: mcfarlanele@doj.state.wi.us  
*Counsel for Plaintiff State of Wisconsin*

**MORGAN, LEWIS & BOCKIUS LLP**

By: s/ Patty A. Eakes

Patty A. Eakes, WSBA #18888

Molly A. Terwilliger, WSBA #28449

1301 Second Avenue, Suite 2800

Seattle, WA 98101

Phone: (206) 274-6400

Email: patti.eakes@morganlewis.com

molly.terwilliger@morganlewis.com

**WILLIAMS & CONNOLLY LLP**

Heidi K. Hubbard (*pro hac vice*)

John E. Schmidtlein (*pro hac vice*)

Kevin M. Hodges (*pro hac vice*)

Jonathan B. Pitt (*pro hac vice*)

Carl R. Metz (*pro hac vice*)

Katherine A. Trefz (*pro hac vice*)

Carol J. Pruski (*pro hac vice*)

680 Maine Avenue SW

Washington, DC 20024

Phone: (202) 434-5000

Email: hhubbard@wc.com

JSchmidtlein@wc.com

khodges@wc.com

jpitt@wc.com

cmetz@wc.com

ktrefz@wc.com

cpruski@wc.com

**COVINGTON & BURLING LLP**

Thomas O. Barnett (*pro hac vice*)

Derek Ludwin (*pro hac vice*)

Katharine Mitchell-Tombras (*pro hac vice*)

One CityCenter

850 Tenth Street, NW

Washington, DC 20001-4956

Phone: (202) 662-5407

Email: tbarnett@cov.com

dludwin@cov.com

kmitchelltombras@cov.com

*Attorneys for Defendant Amazon.com, Inc.*

**ORDER**

IT IS SO ORDERED.

DATED this 1st day of November, 2024.

A handwritten signature in black ink, reading "John H. Chun". The signature is written in a cursive style with a horizontal line underneath the name.

JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE